

UPDATE TO Food Service Flasher Message #01-10

Waste Disposal of Flameless Ration Heaters (FRH)

DTG:141314Z MONTH SEP01

SUBJECT: WASTE DISPOSAL OF FLAMELESS RATION HEATERS (FRH)

1. THIS IS AN UPDATE TO FOOD FLASHER MESSAGE 01-10. THIS MESSAGE SUPERSEDES FOOD FLASHER MESSAGE 01-01, WASTE DISPOSAL OF FLAMELESS RATION HEATERS (FRHS).
2. PURPOSE: TO PROVIDE COMMANDERS, SOLDIERS, AND LOGISTICS PERSONNEL WITH NEW PROCEDURES FOR THE HANDLING AND DISPOSAL OF THE FRH.
3. DISCUSSION:
  - A. TO ENSURE THAT THE SOLDIER WILL HAVE THE OPPORTUNITY TO CONSUME A HOT RATION AT ANYTIME AND ANY PLACE, THE FRH HAS BEEN PACKAGED INSIDE THE MEAL, READY-TO-EAT (MRE).
  - B. THE HEATING PAD IN THE FRH BAG CONTAINS MAGNESIUM, WHICH IS ACTIVATED BY WATER TO CREATE A FLAMELESS, THERMAL REACTION. HYDROGEN GAS IS GIVEN OFF WHEN THE HEATING PAD IS ACTIVATED.
  - C. SOLDIER USE OF THE FRH IS SELECTIVE, DEPENDING ON FACTORS RANGING FROM ENTREE TO CLIMATE. SUBSEQUENTLY, FRHS HAVE BEEN FOUND INACTIVATED IN THE TRASH.
  - D. IN 1999, UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA) DETERMINED THAT DISCARDED FRHS THAT HAVE NOT BEEN ACTIVATED SHOULD BE CLASSIFIED AS A HAZARDOUS WASTE, DEFINED UNDER 40 CFR PART 261.23, DUE TO ITS VIOLENT REACTION WITH WATER AND POTENTIAL TO FORM EXPLOSIVE MIXTURES (I.E., HYDROGEN GAS).
  - E. IN 2001, SBCCOM REQUESTED EPA RECONSIDER THE 1999 GUIDANCE. HQDA RECEIVED EPA'S REPLY IN A NEW GUIDANCE LETTER DATED 29 OCT 2004. EPA HAS MADE THE FOLLOWING CLARIFICATIONS UNDER THEIR NEW GUIDANCE. THESE DISPOSAL GUIDELINES SHALL SUPERSEDE THOSE LISTED IN FOOD FLASHER 01-10 (SEP 01):
    1. UNDER EPA'S NEW GUIDANCE, FRHS ISSUED TO SOLDIERS WITH MRES FOR USE IN THE FIELD, AT MILITARY INSTALLATIONS, OR IN A TEMPORARY OR PERMANENT RESIDENTIAL SETTING ARE EXEMPT FROM RCRA REGULATION AS HOUSEHOLD HAZAROUS WASTE. IN THESE CIRCUMSTANCES, SOLDIERS MAY DISPOSE OF WASTE FRH, EITHER ACTIVATED OR UNACTIVATED, AS NON-HAZARDOUS SOLID WASTE.
    2. FRHS MAY BE DISPOSED OF AS REGULAR TRASH OR UNITS MAY COLLECT ISSUED FRHS FROM SOLDIERS FOR DISPOSAL AS NON-HAZARDOUS SOLID WASTE. THIS ONLY APPLIES TO FRHS THAT HAVE BEEN ISSUED TO SOLDIERS FOR USE, NOT TO FRHS WHILE IN STOCK SUCH AS FROM BULK CASE LOTS.

3. EPA HAS DETERMINED THAT INTACT MRES PACKAGED WITH FRHS ARE NOT REACTIVE HAZARDOUS WASTE AND MAY BE DISPOSED OF AS NON-HAZARDOUS SOLID WASTE. THIS FINDING APPLIES TO ALL FRHS PACKAGED WITH MRES ISSUED OR IN STOCK. SPECIAL DISPOSAL INSTRUCTIONS THAT REFLECTED FORMER HAZARDOUS CLASSIFICATION WILL BE REMOVED FROM THE FRH HEATER BAG LABEL.

4. DISPOSITION OF CASE LOT FRHS (BULK PACKS): ALTHOUGH NO LONGER ISSUED, BULK PACKAGED FRHS MAY STILL EXIST IN UNIT STORAGE AREAS. CASE LOTS OF UNACTIVATED FRHS ARE CLASSIFIED AS HAZARDOUS WASTE. WHEN STORED IN LARGE QUANTITIES BULK FRHS DO PRESENT A SIGNIFICANT FLAMMABLE HAZARD AND SHOULD BE TURNED IN IMMEDIATELY FOR APPROPRIATE DISPOSAL. COORDINATE THIS ACTION WITH DEL OR THE ENVIRONMENTAL SAFETY OFFICE SUPPORTING YOUR UNIT/INSTALLATION.

F. AS ALWAYS, HQ EPA ENCOURAGES RECYCLING AND REUSE OF FRHS WHERE POSSIBLE, AND NOTES THAT INDIVIDUAL STATES MAY IMPOSE MORE STRINGENT REQUIREMENTS ON DISPOSAL. INSTALLATIONS SHOULD CHECK WITH THEIR STATE REGULATORS BEFORE CHANGING FRH DISPOSAL PROCEDURES. OCONUS OPERATIONS SHOULD FOLLOW LOCAL ENVIRONMENTAL LAWS AND/OR THE STATUS OF FORCES AGREEMENT.

G. BYPRODUCTS OF ACTIVATED FRHS: DO NOT RE-USE THE WATER THAT HAS REACTED WITH THE FRH FOR CONSUMPTION PURPOSES.

H. COMMANDERS WILL INCLUDE THIS GUIDANCE IN ALL SAFETY BRIEFINGS AT ALL LEVELS.

4. POINTS OF CONTACT FOR THIS ACTION ARE: ENVIRONMENTAL SCIENCE OFFICER, DSN 687-4287 ALTERNATE, QUAD, DSN 687-3005, FAX 687-3034 OR CHIEF, QUAD, DSN 687-3366. THE COMMERCIAL EXCHANGE IS (804) 734-. WEBPAGE IS <http://www.quartermaster.army.mil/aces> .

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